

CITY OF CHERRY HILLS VILLAGE

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May 24, 2017

Federal Aviation Administration
Care of: Leslie.Lardie@FAA.gov

Re: Denver Metroplex Preliminary Design Comment Phase

This letter was written on behalf of the Mayor and City Council of the City of Cherry Hills Village.

The City of Cherry Hills Village is located on the southwest side of the Denver metro area. It is a small residential community of approximately 2500 households within 6 square miles. The cornerstone of our community is our semi-rural, pastoral character – a tranquil, open oasis in the midst of Denver’s urban sprawl. In the Village, you will find plenty of wildlife, open space, trails, parks, ponds, streams, and homes built on large lots that often range from 1 to 3 acres.

The City Council of Cherry Hills Village has been closely monitoring the progress of the latest FAA Metroplex designs for the Denver International Airport and surrounding vicinity. The City compliments the FAA for setting airspace modernization goals that include replacing an outdated radar system with the NextGEN satellite system. We concur that air traffic safety, fuel savings, reducing carbon footprint, and increased airport efficiencies are priorities.

However, we are concerned that there are several severe impacts that are not being addressed by the FAA with the latest Metroplex design. These impacts not only affect Cherry Hills Village, but will impact tens of thousands of residents throughout the entire Denver area.

Therefore, we are voicing our concerns early in this process and we will be voicing them often. We strongly believe that the FAA needs to work more closely with the City and our community partners. We strongly believe that the information brought forward needs to be forthright, clear to the layperson, and thoroughly vetted. At this time, the information being sent out by the FAA is at best, confusing, incomplete, and is not understandable to the average resident. The FAA website on metroplex design is disappointing, inadequate, impossible to navigate, and useless to the mainstream public. In addition to the general comments above, the City of Cherry Hills Village provides the following comments regarding the preliminary design phase:

The proposed changes do not fix the current problems and in fact, make them worse. The NextGen/RNAV implementation in 2013 turned our tranquil, bucolic village into an aircraft highway – no, worse actually – an intersection of aircraft highways. We went from a community

with virtually no aircraft overflights and noise to one that is now the convergence of SIDs and STARs for both DEN and APA as well as frequent VFR traffic. As a result, we experience frequent overflights at lower altitudes since the airports are competing for airspace. Our community feels unfairly impacted by the flight paths implemented in 2013 and would like to see the traffic over our community decrease back to pre-NextGen levels.

Unfortunately, the proposed changes will increase traffic over our community. The elimination of an existing arrival path into APA from the northeast, and the proposal of the BRNKO STAR will create even more traffic over our community approaching from the northwest. In order to fairly balance the noise burden of air traffic, there need to be more SIDs/STARs, not fewer. We strongly favor maintaining the existing approach and not implementing the BRNKO STAR.

The proposed changes create serious safety concerns. Safety is touted as the reason for eliminating the arrival into Centennial Airport from the northeast, but the proposed alternative creates even larger safety concerns. The proposed BRNKO STAR increases traffic in an already overcrowded and very narrow corridor right up against the mountains. This traffic, when combined with the existing SIDs, STARs, and substantial VFR traffic creates real safety concerns over densely populated areas. We echo the concerns of the Centennial Airport staff, the Colorado Aviation Business Association and the Aircraft Owners and Pilots Association in requesting that the BRNKO STAR not be implemented as proposed.

Environmental Assessment should evaluate overall impact and be more thorough than 2012 EA. The Environmental Assessment performed as part of the previous NextGen/RNAV implementation indicated there would be no significant impact, but that has not been the case. As in many other communities around the country, the “fast-tracked” Environmental Assessment minimized community input, ignored the real impacts, and has proven to be unacceptably inaccurate. We expect that the FAA will take this opportunity to be more thorough and forthcoming in its approach to the Environmental Assessment. This includes considering noise impacts from many different locations in relation to pre-NextGen conditions and not as incremental changes to the very significant changes that were discounted in the past.

Furthermore, we feel that the August 2012 FONSI was false and misleading in relation to Section 4(f) properties in our jurisdiction. We have many historic properties and parks for which “a quiet setting is a recognized feature of the property.” In fact, peace and tranquility are defining characteristics of our entire town where much of the village consist of parks, historic sites (on the National Register), schools, and/or wildlife refuges that are home to rare birds and wildlife. Like the rest of our community, those areas have experienced significant noise increases as a result of the changes made in 2013 and will be further impacted by the currently depicted routes. During the previous EA process, there was no involvement with our community and no coordination with officials from our jurisdiction. We expect that this process will include a full analysis of all of our Section 4(f) property.

NextGen goals are not aligned with the community. The NextGen performance metrics do not appropriately consider impacts (both positive and negative) on neighboring communities. The metrics value fuel economy, passenger experiences, efficiency, and increased capacity with little regard to the cost of these measures to the general public. In-flight time may decrease by

taking a more direct route over highly populated areas which benefits the 200 people on board at the expense of tens of thousands on the ground. Increased capacity financially benefits airports and airlines, but most neighboring communities would not agree that increased capacity is a benefit; quite the opposite. In fact, the impact on neighboring communities and people on the ground is represented by one lonely metric of noise exposure which is measured using a grossly outdated and infective formula. The strong nation-wide outcry over NextGen implementation to date is a clear indicator that the goals of the program, and the metrics used to evaluate those goals, are not aligned with the goals of the tax payers and surrounding communities. We recommend working with communities to understand the problems that the FAA created and propose solutions before proceeding.

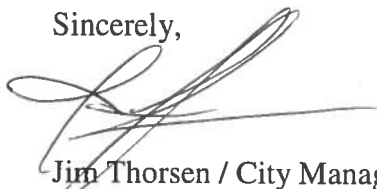
Only one solution is under consideration. Even though concerns have been raised and alternative paths have been presented by pilots, airports and other members of the aviation community, none are included for consideration. The existing paths were not even presented for comparison at the community meetings. Understanding that no design will be perfect, the only way to reach an optimal design is by comparing alternatives. We feel strongly that the EA should consider multiple options thus giving the FAA and the communities the necessary information to consider the pros and cons of various alternatives.

Conclusion:

We look forward to sitting down with the FAA representatives to discuss the above impacts. Over the next several months, we will continue to gather supporters from our local and state government leaders, school and church advocates, environmentalists, business owners and residents about the future impacts of the proposed changes.

Should you have questions, please do not hesitate to contact me at 303-783-2729 or via email at jthorsen@cherryhillsvillage.com.

Sincerely,



Jim Thorsen / City Manager
City of Cherry Hills Village

Letter sent by email to FAA

cc: Mayor and City Council
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